

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

EILEEN GRADY,)	
)	
Plaintiff,)	
v.)	C.A. NO: 05-10097-JGD
)	
)	
WAREHAM POLICE DEPARTMENT,)	
TOWN OF WAREHAM,)	
THOMAS JOYCE, and)	
MICHAEL J. HARTMAN)	
)	
Defendants.)	
)	

JOINT MOTION TO AMEND THE SCHEDULING ORDER

The parties hereby jointly move to amend the Scheduling Order in this case by:

(1) extending the discovery deadline to May 19, 2006; and (2) rescheduling the pretrial conference to June 1, 2006. In support of this Motion, the parties state the following:

1. The current Scheduling Order provides that the discovery deadline is March 2, 2006.
2. The pretrial conference is currently scheduled for March 9, 2006, at 2:30 p.m.
3. Most of the discovery has been completed in this action (i.e., written discovery has been served and answered, and several depositions have been taken).
4. The first day of the Plaintiff's deposition was taken on January 25, 2006. The second day of her deposition was scheduled for February 22, 2006; however, it had to be postponed because the Plaintiff required in-patient treatment for a medical condition.
5. It is anticipated that the Plaintiff will require at least another six to eight weeks of treatment (and thereafter will need additional time to recuperate and adjust from the treatment) before her deposition can be completed.

6. The parties will be unfairly prejudiced if they are not given adequate time to prosecute and defend the claims in this action and to complete the pending discovery.

7. On the other hand, no prejudice will injure to the parties from the allowance of this Motion.

8. The parties believe that enlarging time to complete discovery will be in their interests as well as the interest of justice.

WHEREFORE, in order to have sufficient time to complete discovery, the parties jointly request that the Scheduling Order be amended in this case by: (1) extending the discovery deadline to May 19, 2006; and (2) rescheduling the pretrial conference to June 1, 2006, or as soon thereafter as the Court's calendar permits.

Respectfully submitted,

Plaintiff, Eileen Grady,
By her attorneys,

Defendants Wareham Police Department, Town
Of Wareham, Thomas Joyce, and Michael J.
Hartman,
By their attorneys,

/s/ Barbara A. Robb
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Dated: February 22, 2006

/s/ Deborah I Ecker
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Dated: February 22, 2006